

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Court File No. 18-cv-1776 (JRT/JFD)

This Document Relates To:

Commonwealth of Puerto Rico v. Agri Stats, et al., No. 19-cv-2723 (JRT/JFD)

Sysco Corporation v. Agri Stats Inc., et al., No. 21-cv-1374 (JRT/JFD)

Amory Investments LLC v. Agri Stats, Inc., et al., No: 21-cv-1697 (JRT/JFD)

**JOINT MOTION REGARDING
CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the Certain DAPs and the Commonwealth of Puerto Rico's Motion to Compel (Dkt. No. 1593). Pursuant to Local Rule 5.6, Plaintiff Commonwealth of Puerto Rico, Direct Action Plaintiffs Sysco Corporation and Armory Investments LLC, and Defendant JBS USA Food Company ("JBS USA") submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
1594	1595	Unredacted Memorandum of Certain DAPs and The Commonwealth of Puerto Rico in Support of Motion to Compel	The parties agree that this document should remain sealed, as a public redacted version was filed contemporaneously.		This document should remain sealed as the redacted portions quote nonpublic information from JBS USA's confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).
1597		Exhibit F to the Declaration of Michael S. Mitchell in Support of the Motion to Compel Certain DAPs and the Commonwealth of Puerto Rico (JBS USA Code of Conduct)			This document should remain sealed as it contains nonpublic information relating to JBS USA's policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

1654	1655	Unredacted JBS USA Food Company's Opposition to Motion to Compel	The parties agree that this document should remain sealed, as a public redacted version was filed contemporaneously.		This document should remain sealed as the redacted portions quote nonpublic information regarding JBS USA's business and confidential policies and procedures, from depositions designated as "Highly Confidential" by JBS under the Protective Order (Dkt. No. 1155).
1657		Exhibit 1 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Ross Manternach)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

1657-1		Exhibit 2 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Martin Dooley)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).
1657-2		Exhibit 3 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Garry Albright)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

1657-3		Exhibit 4 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Tim Hiller)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).
1657-4		Exhibit 5 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Jerry Brooks)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

1657-5		Exhibit 6 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Brad Lorenger)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).
1657-6		Exhibit 7 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Shawn Mills)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

1657-7		Exhibit 8 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Tim Uber)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).
1657-8		Exhibit 9 to Declaration of Jessica J. Nelson (Excerpts of the transcript of the deposition of Dale DeGroot)	The parties agree that this document should remain sealed in its entirety.		This document should remain sealed as it is an excerpt of deposition testimony containing nonpublic information relating to JBS USA's business and confidential policies and procedures, designated as "Highly Confidential" by JBS USA under the Protective Order (Dkt. No. 1155).

Dated: December 27, 2022

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